

LSB

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

ALAA TAWFIK

Case No.

19- 929 -M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 2, 2019 in the county of Bucks in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

18 U.S.C. Section 2422(b)

Offense Description

Using the mail or any facility or means of interstate or foreign commerce to entice any minor to engage in sexual activity, for which any person could be charged with a criminal offense, that is, attempted manufacturing of child pornography, and any attempts to do so.

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.

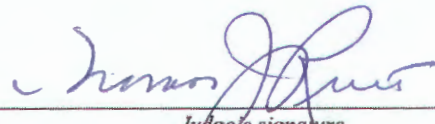
Complainant's signature

Adam Sucheski, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

5/29/19

Judge's signature

City and state: Philadelphia, PA

The Hon. Thomas J. Rueter, U.S.M.J.

Printed name and title

19-929M

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND WARRANT

I, Adam Sucheski, a Special Agent with the Federal Bureau of Investigation ("FBI"), being first duly sworn, depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent with the FBI and have been for over 13 years. I am currently assigned to the Philadelphia Division, Fort Washington Resident Agency where I have participated in a broad range of criminal investigations including armed robberies, fugitives, art theft, drug trafficking, bank robberies, counterintelligence, computer intrusions, child exploitation, and threatening communications, among other crimes. While employed by the FBI, I have investigated federal criminal violations related to high technology or cybercrime, child exploitation, and child pornography. I have gained experience through training, my prior employment, the FBI academy, and everyday work relating to conducting these types of investigations. I have received training in the area of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

3. I make this affidavit in support of an application for an arrest warrant for ALAA TAWFIK, further described in Attachment A.

4. I submit this affidavit seeking the issuance of an arrest warrant for, and a criminal complaint charging, ALAA TAWFIK with using the mail or any facility or means of interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States to knowingly persuade, induce, entice, or coerce any individual who has not attained the age of 18

years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, and any attempts to do so, in violation of Title 18, United States Code, Section 2422(b).

5. The facts in this Affidavit are based in part on my investigation of this matter and on information provided by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

Probable Cause

6. On March 2, 2019, an undercover FBI employee ("UC") placed a profile on the Skout¹ app which indicated that she was a 19-year-old woman. The UC also listed on the Skout profile her associated Kik² account name. The UC directed anyone who messaged the UC on Skout to contact her on the Kik application. Minimal conversation, if any, occurred on Skout.

7. On March 2, 2019, Kik user "joseph.botros," with a profile name of "Joseph H." messaged the UC, stating, "hey." The UC replied back "hey 11 f here" indicating that the user was 11-years-old and a female. The user "joseph.botros" responded, "what do you mean?" to which the UC replied, "never mind."

8. User "joseph.botros" then sent an image of an erect penis and a conversation between the UC and "joseph.botros" continued as noted below. The conversation is not

1 www.skout.com is a location-based social networking and dating application and website. On Skout, users can chat with other users, share photographs, and filter users by geographic location.

2 www.kik.com is an instant-messaging mobile application. On Kik, users can chat with other users and share photographs and videos.

documented in its entirety:

UC³ Where u at?
 UC I'm in Bensalem
 JB⁴ Send me your pics babe
 UC What do u want to see? [devil emoji]
 JB Your lil sweet pussy babe
 UC mmm
 JB I drive I can come to you now
 UC oh really
 UC my mom is out late shift on wed and thurs....
 JB Cool
 JB How about tonight?
 UC no she is here
 UC but that a nice dick

 JB I'm like an hour away but I don't mind driving
 UC I'd love that but I can't tonight babe
 UC my mom works until like midnight wed and thurs
 UC she doesn't leave me home alone a lot since I'm 11 but those days I will
 be

 JB Is it your first time?
 UC I've only done a blow job
 JB Well you will lose your virginity and have some bleeding but it doesn't
 hurt
 UC ooo
 UC and you'll teach me what to do
 JB Of course I'm gonna tell you everything
 UC What u want do?
 JB I'm gonna eat ya pussy and lick your clit till you cum over my tongue
 UC mmmm that sounds hot
 JB Then you will lay down on the bed and I'm gonna lay on the top of you
 kissing u then slowly I'm gonna put my dick inside and keep kissing and lick your
 nipples.
 UC wow this sounds awesome
 UC and ur cool with my age?
 JB if you not gonna cause me any problems
 UC not me I'm excited to try
 ...
 JB You're 16 or 17
 UC no silly 11
 JB oh ok lol

3 "UC" indicates the undercover FBI employee.

4 "JB" indicates the user "joseph.botros."

JB Still no problem with me
...
JB send me some nuds [sic] lol
UC what u want to see? Maybe
JB Your lil sweet pussy babe
UC it is lil!
JB Let me see and I'll tell u how beautiful is it
...
JB [sent images of a medium skin tone male in a pool]
...
JB Send me a pic
JB of you babe
UC I sent u a few already babe
JB Yeah but now I'm coming to u tomorrow and this is getting serious now
and I want u to trust and do everything I say so u can learn quick
UC I don't wanna do my face babe
JB Ok
JB Send me a pic of your pussy babe
UC I don't wanna send that babe. Something else?
JB I wanna see a naked pic of u babe
UC [sent an image depicting a prepubescent female without a shirt on]
JB So sexy
JB Can you change the underwear and send me another pic babe please?
UC no babe I didn't really wanna send that one
UC I'm shy and nervous
JB Babe you have to trust me
...
JB You need to listen to me babe
UC babe I just don't wanna send more
JB Just one more last pic
JB Type this number 23041999 in a paper and take a pic with it
JB with no clothes but the underwear
...
JB One more pic babe please
JB Ok just touch your toes with your hand and send it to me

9. Your Affiant is aware that those who are attempting to entice minors into producing sexually explicit images or who are attempting to vet potential law enforcement officers often direct the minor to produce individual, specific images as noted above (e.g., number on a paper, image of toes, etc.) which cannot be obtained from the Internet. Your Affiant is aware that these actions are not typical for a first time offender.

10. On March 7, 2019, Kik Interactive Inc. ("Kik") responded to a subpoena for records related to user "joseph.botros." The records from Kik revealed an email address of thesniper_n70@yahoo.com associated with the account, along with IP connection records noting recent connections from AT&T wireless. Your Affiant is aware that AT&T does not maintain subscriber records associated with IP connection records. Additionally, the records indicate that the Kik account was being accessed via an Apple iPhone.

11. On April 3, 2019, Oath Holdings, Inc., which owns Yahoo, responded to a subpoena for records related to the email account, thesniper_n70@yahoo.com, and provided a verified telephone number associated with the account, 347-337-8923, and the name "Mr alaa tawfik."

12. Your Affiant conducted open source research on telephone number 347-337-8923 and located a Viber⁵ account associated with the number. In the Viber account, the image of the male in the pool sent via the Kik app noted above was displayed on the Viber account as the user's profile picture.

13. Your Affiant conducted open source research on Facebook and found a Facebook account for an individual named ALAA TAWFIK. The individual's profile picture is the image of the male in the pool sent via the Kik app, as described above.

14. Additionally, public source databases indicated that the registered owner or user of telephone number 347-337-8923 is ALAA TAWFIK.

15. On April 4, 2019, AT&T responded to a subpoena for records related to 347-337-8923. The response indicated that the subscriber is ALAA TAWFIK.

⁵ www.viber.com is a cross-platform voice over IP and instant messaging software application. Users can sign-up for the application with their cell phone number and download the application to their phone. Through the Viber app, users can chat with other users and make phone calls over the Internet.

16. The New Jersey Department of Transportation confirmed that an individual named ALAA TAWFIK has a current driver's license.


17. Your Affiant conducted checks with other law enforcement agencies and learned that TAWFIK is a naturalized United States citizen from Egypt.

18. On May 29, 2019, the FBI executed a search warrant at ALAA TAWFIK'S residence, located at 124 North Portland Avenue, Floor 1, Ventnor, New Jersey 08406. There, your affiant seized multiple iPhones and other electronic devices, including an Apple laptop computer.

Conclusion

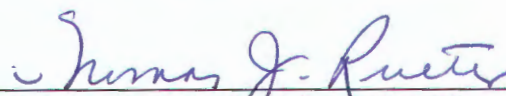
19. Based upon the information above, I respectfully submit that there is probable cause to believe that ALAA TAWFIK violated Title 18 U.S.C. Section 2422(b), and therefore, I respectfully request that the attached arrest warrant be issued.

Respectfully submitted,



Adam Sucheski
Special Agent, Federal Bureau of Investigation

Sworn and subscribed
before me this 29th day of May, 2019.



HONORABLE THOMAS J. RUETER
United States Magistrate Judge

ATTACHMENT A

The person of Alaa Tawfik, with a date of birth of [REDACTED] brown eyes, brown hair, 5'09" tall. A photograph of Alaa Tawfik appears below:

